

AFFIDAVIT OF DENZIL DIAS

STATE OF NEW YORK

§

COUNTY OF NEW YORK

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BEFORE ME, the undersigned authority, on this day personally appeared Denzil Dias, who, upon his oath, deposed and stated the following:

1. My name is Denzil Dias. I am over 21 years of age, have never been convicted of a felony or crime involving moral turpitude, and I am fully competent to make this Affidavit. The facts stated herein are based on my personal knowledge and are true and correct.
2. Before IHT Wealth Management, LLC ("IHT") acquired the assets of PRB Wealth Management, LLC ("PRB") in or about September of 2020, I served as the Senior Vice President and Chief Operating Officer of PRB. Since the acquisition of PRB's assets by IHT was completed in or about October of 2020, I have served as a Senior Vice President at IHT.
3. During my time at IHT, I only met Adam S. Kaplan and Daniel E. Kaplan (the "Kaplans") twice. Further, throughout the year of 2020, the Kaplans only came to the PRB Office located at 122 E. 42nd Street, Suite 1610, New York, New York 10168 (the "PRB Office") three (3) times: *first*, on January 23, 2020, the Kaplans came in for a brief introductory meeting and to examine the PRB Office; *second*, according to the PRB Office logs (the "logs"), the Kaplans entered the PRB Office on Saturday, October 3, 2020, but to my knowledge, the Kaplans did not bring any items or equipment with them, or move anything in on that date; *third*, the logs

EXHIBIT

1

reflect that the Kaplans entered the PRB Office on Thursday, November 19, 2020.

See PRB Office Logs, attached hereto as **Exhibit A**.

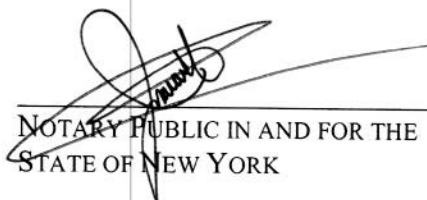
4. To my knowledge, the Kaplans did not bring any items or equipment into the PRB Office on any of the aforementioned dates in 2020.
5. In 2021, the Kaplans came to the PRB Office only once—on July 13, 2021—to pick up their new security identification cards. To my knowledge, however, the Kaplans did not bring any items or equipment with them to the PRB Office on this date.
6. Neither my staff nor I ever saw the Kaplans bring any of their alleged personal property into the PRB Office, including, but not limited to desktop and laptop computers, external hard drives, electronic devices, and/or paper files.
7. Accordingly, as of July 16, 2021, none of the Kaplans' alleged personal property, including, but not limited to desktop and laptop computers, external hard drives, electronic devices, and/or paper files ever existed at the PRB Office.

Further affiant sayeth not.



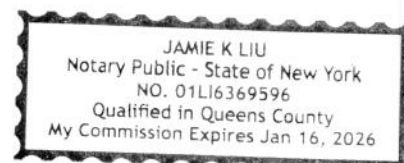
Denzil Dias

SUBSCRIBED AND SWORN TO BEFORE ME on the 30th ^{August} day of 2023 to certify which witness my hand and official seal.



NOTARY PUBLIC IN AND FOR THE
STATE OF NEW YORK

My commission expires: January 16, 2026



UnitID	AlarmType	TransactionType	AlarmSpecial	CardFirstName	CardLastName	CardBatch	CardNumber	DeviceName	Direction	AlarmDateTime
ACU1		2 Access Granted		Daniel	Kaplan	0	44540	Lobby In 2	In	10/3/2020 15:07
ACU1		2 Access Granted		Adam	Kaplan	0	44539	Lobby In 2	In	10/3/2020 15:07
ACU1		2 Access Granted		Adam	Kaplan	0	44539	Lobby In 2	In	11/19/2020 15:28



09/07/2021 14:12:47

History Activity

Page: 2

	Aperio Device offline:	YES	Aperio Device online:	YES
	Aperio DIU restarted:	YES	Aperio DIU Watchdog reset:	YES
	Aperio Handle position:	YES	Aperio Radio disturbance cleared:	YES
	Aperio Radio disturbance:	YES	Aperio Request to exit:	YES
	Aperio unknown event:	YES		
Comms Rx Accounts:	(All)			
Floor:	(All)			
Dial-In Alarm Site:	(None)			
Maintenance Zone:	(None)			
System:	Scheduled Operations:	NO	Trigger Operations:	NO
	Card Commands:	NO	Valid Card Transaction:	NO
	User Comments:	NO	Uncategorized:	NO
	Card User PIN Changes:	NO	User Initiated Door Command:	NO
	Card Holder Deact-Secondary Expiry	NO	Device plugin load failed	NO
	Insufficient space	NO	Video purged early	NO
	NVR Status	NO		
Integrated Modules:	M4000:	YES		

What	Where	Who	When	Card No.
Granted Access [5029]A&B Bank Reader 3 Turnstile 3		Kaplan, Adam	07/13/2021 02:45PM	5029

Total Number of Records: 1

*** End of Report ***

09/07/2021 14:13:04

History Activity

Page: 2

	Aperio Device offline:	YES	Aperio Device online:	YES
	Aperio DIU restarted:	YES	Aperio DIU Watchdog reset:	YES
	Aperio Handle position:	YES	Aperio Radio disturbance cleared:	YES
	Aperio Radio disturbance:	YES	Aperio Request to exit:	YES
	Aperio unknown event:	YES		
Comms Rx Accounts:	(All)			
Floor:	(All)			
Dial-In Alarm Site:	(None)			
Maintenance Zone:	(None)			
System:	Scheduled Operations:	NO	Trigger Operations:	NO
	Card Commands:	NO	Valid Card Transaction:	NO
	User Comments:	NO	Uncategorized:	NO
	Card User PIN Changes:	NO	User Initiated Door Command:	NO
	Card Holder Deact-Secondary Expiry	NO	Device plugin load failed	NO
	Insufficient space	NO	Video purged early	NO
	NVR Status	NO		
Integrated Modules:	M4000:	YES		

What	Where	Who	When	Card No.
Granted Access [5030]A&B Bank Reader 2 Turnstile 2		Kaplan, Daniel	07/13/2021 02:45PM	5030

Total Number of Records: 1

*** End of Report ***